

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CAITLIN O’CONNOR,)	
)	
Plaintiff,)	No. 3:20-cv-00628
)	
v.)	Judge Eli J. Richardson
)	
)	
THE LAMPO GROUP, LLC a/k/a)	Magistrate Judge Frensley
RAMSEY SOLUTIONS,)	Jury Demand
)	
Defendant.)	

**NOTICE OF FILING DOCUMENTS IN SUPPORT OF PLAINTIFF’S OPPOSITION TO
DEFENDANT’S MOTION FOR SUMMARY JUDGEMENT**

Plaintiff notifies the Court that she is filing the following documents in support of her Opposition to Defendant’s Motion for Summary Judgment:

1. Plaintiff’s Deposition Exhibits (“Dep. Ex.”) 19, 20
2. Defendant’s Deposition Exhibit (“O’Connor Dep. Ex.”) 26

Plaintiff’s Opposition also references the following documents that currently exist in the record, whether unsealed or sealed.

I. Previously filed Unsealed

1. 6/29/21 Deposition of Armando Lopez (“Lopez Dep.”), Doc. 93-1
2. 6/30/21 Deposition of Mark Floyd (“Floyd Dep.”), Doc. 93-2
3. 7/20/21 Deposition of Jennifer Sievertsen (“Sievertsen Dep.”), Doc. 93-3
4. 8/6/21 Deposition of Jack Galloway (“Galloway Dep.”), Doc. 93-4
5. 9/10/21 Deposition of Suzanne Simms (“Simms Dep.”), Doc. 93-5
6. 9/28/21 Deposition of Mike Finney (“Finney Dep.”), Doc. 93-6
7. 9/30/21 Rule 30(b)(6) Deposition (Lopez, Galloway (“30(b)(6) Dep.”)), Docs. 93-

7 and 93-8

8. 11/12/21 Deposition of Dave Ramsey (“Ramsey Dep.”), Doc. 93-10

9. Plaintiff’s Deposition Exhibits (“Dep. Ex.”):

5 – Doc. 94-3
7 – Doc. 94-4
14 – Doc 94-5
18 – Doc. 94-6
23 – Doc. 94-7
36 – Doc. 94-9

II. Previously Filed Under Seal

1. 6/22/21 Dep. Caitlin O’Connor (“O’Connor Dep.”), Sealed Doc. 76-1

2. 9/21/21 Dep. Andrew Walker, Ph.D. (“Walker Dep.”), Sealed Doc. 76-8

3. MSJ Ex. 1, Plaintiff’s Designated Expert Report: Ellen T. Armour, Ph.D.¹,
Sealed Doc. 76-27

4. MSJ Ex. 2, Plaintiff’s Designated Expert Report: Julie Ingersoll, Ph.D.²,
Sealed Doc. 76-28

5. MSJ Ex. 4, 12/21/18 Email Thread, Sealed Doc. 76-30

6. Defendant’s Deposition Exhibit (“O’Connor Dep. Ex.”) 9, Sealed Doc. 76-
26.

7. Plaintiff’s Deposition Exhibits (“Dep. Ex.”):

1, 2, 3 – Sealed Doc. 76-14
8, 9, 12 – Sealed Doc. 76-15
17 – Sealed Doc. 76-16
24 – Sealed Doc. 76-18
41 – Sealed Doc. 76-23

¹ Dr. Armour is the E. Rhodes and Leona B. Carpenter Chair in Religion, Gender, and Sexuality, Vanderbilt University Divinity School.

² Dr. Ingersoll is Professor of Religious Studies, Religious Program Director, Department of Philosophy and Religious Studies, University of North Florida.

Respectfully submitted,

/s/ Heather Moore Collins

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been e-mailed on July 29, 2025 to counsel of record through the court's CM/ECF system:

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/s/ Heather Moore Collins
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